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T.A. WOOD

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RAYMOND J. MANZANILLO,

Plaintiff,

v.

GREGORY D. LEWIS, et al.,

Defendants.

Case No. 3:12-cv-05983-JST

**STIPULATION TO MODIFY SCHEDULING  
ORDER**

Plaintiff Raymond Manzanillo (“Plaintiff”) and Defendants N. Brown, Gregory D. Lewis, J. Hallock, K. McGuyer, Matthew Cate, and T.A. Wood (“Defendants”) (collectively the “Parties”) by and through their counsel hereby stipulate and jointly request the Court to extend certain deadlines in the Scheduling Order issued on May 18, 2016 (Dkt. No. 190).

As noted in the Parties’ previous request for leave to take certain depositions after the current fact discovery cut-off (Dkt. No. 196), the Parties intend to conduct a site visit of facilities at Pelican Bay State Prison and to depose Defendant Kurt McGuyer, Correctional Lieutenant John Diggle, Correctional Sergeant B. Grenert, and a representative of the California Department of Corrections and Rehabilitation (“CDCR”) under Federal Rule of Civil Procedure 30(b)(6). Due to the Parties’ schedules and the availability of the intended deponents, the Parties cannot complete those depositions or the site visit before the current fact discovery cut-off of August 5, 2016. Accordingly, the Parties request that the Court extend the fact discovery cut-off by approximately thirty (30) days, to September 2, 2016.

Additionally, because the information obtained through those depositions and the site visit will likely be relevant for experts analyzing issues in this case, the Parties request that the Court extend the deadlines for expert disclosures, rebuttal disclosures, and expert discovery by approximately fourteen (14) days, to September 9, 30, and October 14, respectively.

Accordingly, the Parties propose the following schedule:

Event	Date
Fact discovery cut-off	September 3, 2016
Expert disclosures	September 9, 2016
Expert rebuttal	September 30, 2016
Expert discovery cut-off	October 14, 2016
Deadline to file dispositive motions	October 21, 2016
Pretrial conference statement due	January 10, 2017
Pretrial conference	January 19, 2017, at 2:00 p.m.
Trial	February 6, 2017, at 8:30 a.m.

**IT IS SO STIPULATED.**

DATED: August 1, 2016

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ Michael A. Wahlander

Francis J. Ortman III  
Aryeh M. Hersher  
Jason M. Allen  
Michael A. Wahlander

Attorneys for Plaintiff  
RAYMOND J. MANZANILLO

DATED: August 1, 2016

Respectfully submitted,

MCNAMARA LAW FIRM

By: /s/ William Lee McCaslin

Peter Jon Hirsig  
William Lee McCaslin

Attorneys for Defendant  
N. BROWN

DATED: August 1, 2016

Respectfully submitted,

CALIFORNIA STATE ATTORNEY  
GENERAL'S OFFICE

By: /s/ Michael James Quinn

Michael James Quinn

Attorneys for Defendants  
GREGORY D. LEWIS; J. HALLOCK;  
K. MCGUYER; MATTHEW CATE AND  
T.A. WOOD

**ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

I, Michael A. Wahlander, attest that concurrence in the filing of this stipulation has been obtained from the signatories, William Lee McCaslin and Michael James Quinn, counsel for Defendants.

Executed this 1st day of August 2016, in San Francisco, CA.

/s/ Michael A. Wahlander  
Michael A. Wahlander

**~~PROPOSED~~ ORDER**

Pursuant to the Parties' stipulation and good cause appearing, the Scheduling Order [ECF No. 178] is amended to reflect the dates set forth in the Parties' stipulation.

IT IS SO ORDERED.

Dated: August 1, 2016

